

EXHIBIT 4

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL) MDL No. 2804
PRESCRIPTION OPIATE)
LITIGATION) Case No.
) 1:17-MD-2804
)
THIS DOCUMENT RELATES TO) Hon. Dan A.
ALL CASES) Polster
)

— — —
Thursday, June 6, 2019
— — —

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW
— — —

Videotaped Deposition of LAURENCE C.
BAKER, Ph.D., held at JONES DAY, 1755
Embarcadero Road, Palo Alto, California,
commencing at 9:18 a.m., on the above date,
before Debra A. Dibble, Registered Diplomate
Reporter, Certified Realtime Reporter,
Certified Realtime Captioner, and Notary
Public.

— — —
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1 setting, where it's similar to what we've got
2 here, where there's an expert report that
3 you've commented on. That hasn't occurred
4 previously; correct?

5 A. That's correct.

6 Q. Have you ever participated in
7 the peer review of any paper that Professor
8 Cutler was an author on?

9 A. I peer review a lot of papers.
10 And it is quite possible, but I couldn't
11 recall a specific instance in this -- as I
12 sit here right now.

13 Q. And obviously you express in
14 your report here various commentary and
15 criticisms on Professor Cutler's report.

16 As a general matter, do you
17 have an opinion on Professor Cutler's
18 academic rigor?

19 MR. BREWER: Objection to form.

20 THE WITNESS: I have seen
21 Professor Cutler do some nice work
22 over the years, and I have a generally
23 positive view of research that he
24 does. I'd be careful to say that I

1 Q. And again, apart from this
2 case, have there been any indications on
3 which you can recall expressing any material
4 criticism of any work done by Professor
5 Gruber?

6 A. Not in any formal sense, no.

7 Q. And do you have a general
8 opinion of the quality of the work of
9 Professor Gruber that you've seen apart from
10 work in this litigation?

11 A. Oh, I would give a similar
12 answer to the one I gave before. I've
13 observed Professor Gruber do some good work
14 over time, and I -- my general impression is
15 positive of the work that he does. But
16 again, I would never extend that as a blanket
17 statement to anything that -- or everything
18 that he's ever done.

19 Q. How about Professor Rosenthal?
20 Are you -- do you have -- are you familiar
21 with her apart from this litigation?

22 A. Yes.

23 Q. And in what context?

24 A. In a similar context. We cross

1 But in the litigation setting,
2 apart from this case, have you had occasion
3 to comment on any expert report or testimony
4 provided by Professor McGuire?

5 A. No.

6 Q. And in any setting can you
7 recall, apart from this case, expressing any
8 material disagreement with any work done by
9 Professor McGuire?

10 A. No.

11 Q. And do you have an overall
12 general view as to the academic quality of
13 the work done by Professor McGuire?

14 A. It would be the same kind of
15 answer that I've given in the previous
16 questions.

17 Q. Apart from the expert reports
18 that are listed on Appendix C, are you aware
19 of the identity of any other plaintiff
20 experts who have submitted reports in this
21 litigation?

22 A. No, I don't believe I am.

23 Q. And have you reviewed any
24 reports submitted by any other expert

CERTIFICATE

I, DEBRA A. DIBBLE, Registered
Diplomate Reporter, Certified Realtime
Reporter, Certified Realtime Captioner,
Certified Court Reporter and Notary Public,
do hereby certify that prior to the
commencement of the examination, LAURENCE C.
BAKER, Ph.D. was duly sworn by me to testify
to the truth, the whole truth and nothing but
the truth.

I DO FURTHER CERTIFY that the
foregoing is a verbatim transcript of the
testimony as taken stenographically by and
before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

I DO FURTHER CERTIFY that pursuant
to FRCP Rule 30, signature of the witness was
not requested by the witness or other party
before the conclusion of the deposition.

I DO FURTHER CERTIFY that I am
neither a relative nor employee nor attorney
nor counsel of any of the parties to this
action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action.



DEBRA A. DIBBLE, RDR, CRR, CRC
NCRA Registered Diplomate Reporter
NCRA Certified Realtime Reporter
Certified Court Reporter

Dated: 6-6-19